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SPECIAL COUNSEL FOR ANSON FINANCIAL INC. SPECIAL COUNSEL FOR ANSON FINANCIAL INC.

DEBTOR AND DEBTOR IN POSSESSION DEBTOR AND DEBTOR IN POSSESSION

And And

COUNSEL FOR DEFENDANT COUNSEL FOR DEFENDANT

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

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	CASE NO. 21-41517	
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	Adv. No. 21-04071	
§		
	Removed From:	
	Cause No. 342-288776-16	
§	342 nd Judicial District Court	
	Tarrant County, Texas	
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DEFENDANT'S EXHIBIT AND WITNESS LIST FOR TRIAL

TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:

Anson Financial, Inc. Defendant and Debtor/Debtor in possession ("Anson" or the "Defendant") files this *Exhibit and Witness List for Trial* (the "List") and designates the following:

Def's Exhibit and Witness List Page 1

EXHIBIT	DESCRIPTION	Offered	Admitted	Excluded
DEF001	20130208 Certified Copy of FAM Forfeiture			
DEF002	20170115 Certificate of Reinstatement			
DEF003	Plaintiffs' 5 th Amended Petition			
DEF004	JV Agreement with Amendments			
DEF005	287 JV Bank Account Signature Card			
DEF006	Frazier IRS Lien			
DEF007	September 5, 2014 - Bill of Sale from Jentex to Anson			
DEF008	September 9, 2014 – Letter to Frazier from Anson			
DEF009	September 18, 2014 – Letter from Frazier to Anson			
DEF010	March 30, 2015 – Kathy Bond email with Statement of Brian Frazier			
DEF011	April 13, 2015 – Check 16141 from Anson to Frazier torn up			
DEF012	20160930 Demand Letter from Gongloff			
DEF013	20161004 Demand letter from Gongloff			
DEF014	20161005 Emails Caleb to Kelly Gongloff*			
DEF015	20161009 Email JMF to Kelly Gongloff			
DEF016	20161011 Emails between JMF and Kelly Gongloff *			
DEF017	Screenshot of Dropbox File shared with Kelly Gongloff			

Def's Exhibit and Witness List Page 2

WITNESSES

- 1. J. Michael Ferguson
- 2. Brian Frazier
- 3. M. Jason Ankele (attorney's fees)
- 4. Any witnesses as may be necessary for rebuttal purposes.

Def's Exhibit and Witness List Page 3

^{*}Defendant hereby gives written notice of the intent to offer the record and is providing certification via business records affidavit available for inspection included with the exhibit.

Debtor reserves the right to amend and/or supplement this designation, and/or to seek additional relief as may be necessary. Copies of any exhibits are being included as attachments herewith.

Dated: March 21, 2022 Respectfully submitted:

Magan Law, PLLC

By: /s/ *Kathryn Hernandez*

Kathryn Hernandez (TX SBN: 24107854)

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Sullivan & Cook

By: /s/ M. Jason Ankele

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Email: jankele@sullivancook.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on March 21, 2022 (1) by electronic notice to all ECF users who have appeared in this case to date, as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility as attached below.

/s/ Kathryn Hernandez
KATHRYN Hernandez

Def's Exhibit and Witness List Page 4